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**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking to Create a
Consistent Regulatory Framework for the
Guidance, Planning, and Evaluation of Integrated
Demand-Side Resource Programs.

R.14-10-003
(Filed October 2, 2014)

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) OPENING COMMENTS
ON PROPOSED DECISION ADOPTING AN EXPANDED SCOPE, A DEFINITION,
AND A GOAL FOR THE INTEGRATION OF DEMAND SIDE RESOURCES

JANET S. COMBS
R. OLIVIA SAMAD

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-3477
Facsimile: (626) 302-7740
E-mail: Olivia.Samad@sce.com

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I.

INTRODUCTION

Pursuant to Rule 14.3 of the California Public Utilities Commission's (CPUC's or Commission's) Rules of Practice and Procedure, Southern California Edison Company (SCE) submits its opening comments on Commissioner Florio's Proposed Decision Adopting an Expanded Scope, a Definition, and a Goal for the Integration of Demand Side Resources (PD).

The PD changes the scope of the Integrated Demand-Side Resource (IDSR) Order Instituting Rulemaking (R.) 14-10-003 (OIR) to be broader than initially anticipated, with an increased focus on a regulatory framework for sourcing the needs for distributed energy resources (DERs) as identified in the investor-owned utilities' (IOUs') Distribution Resources Plans (DRPs). As the PD acknowledges, SCE and other parties contend that issues related to integrating DERs into the distribution system should be addressed in proceeding R.14-08-013 (DRP OIR) and other planning-related proceedings.¹ SCE's reason for recommending the

¹ PD, p. 9.

Commission keep issues related to integrating DERs into system planning in the DRP OIR is because it is “an inefficient use of resources and would cause confusion to address those problems” in the IDSR OIR.² For reasons explained in the Discussion section below, the proposed expanded scope of the IDSR OIR is confusing and appears redundant with aspects of the DRP OIR, which will cause an inefficient use of Commission and parties’ resources. Therefore, SCE maintains its initial recommendation that the Commission use the IDSR OIR to resolve policy and process issues that span different types of demand-side resources (DSRs) (such as energy efficiency and demand response) so DSRs can be better integrated to meet customer and system needs.³

If the Commission adopts the proposed scope revisions in the PD, SCE recommends the Commission provide greater clarity on the changes to the scope of this proceeding by revising the PD with the following modifications (SCE explains these recommendations in the Discussion section below):

- Requirement for stakeholders to develop a roadmap to identify the timing and interdependencies among the IDSR OIR, the DRP OIR, and several other proceedings addressing policy issues for DSRs and DERs;
- Additional clarification on the distinction between the IDSR OIR and DRP OIR;
- Identification of the components of the IDSR regulatory framework;
- Use of the term DER rather than DSR to reflect the inclusion of resources on the utility-side of the meter;
- Clarification that modifications to tariffs already addressed in other active proceedings should be implemented through those proceedings rather than the IDSR OIR; and

² SCE’s Opening Comments on Joint Assigned Commissioner and Administrative Law Judge’s Ruling Requesting Responses to Questions, filed May 15, 2015 in this proceeding, p. 3.

³ *Id.*

- Clarification that a ruling *and scoping memo* will be issued to set forth the schedule *and modified scope* of this proceeding.

SCE includes its recommended revisions to the PD in Appendix A hereto, including recommended revisions to the Findings of Fact, Conclusions of Law, and Ordering Paragraphs.

II.

DISCUSSION

A. The PD Should Clarify the Relationship Between the IDSR OIR and Other DER-Related Proceedings

1. The PD Should Require a Roadmap to Provide Clarity on the Relationship Between the IDSR OIR and Other Relevant Proceedings

Though the PD explains the proposed relationship between the IDSR OIR and the DRP OIR, it does not address the connection between the IDSR OIR and other significant Commission proceedings already addressing policy issues and funding requests related to different types of DERs. The original IDSR OIR properly anticipated this proceeding would be informed by several other Commission proceedings.⁴ For example, the Commission has active proceedings addressing policy issues related to demand response (R.13-09-011), energy efficiency (R.13-11-005), distributed generation (R.12-11-005), energy storage (R.15-03-011), and several others. It is helpful to know that the Commission envisions this proceeding as the development of “a framework to enable the offering of a wide portfolio of demand-modifying technologies best tailored to customers,”⁵ but it is also important to understand how the Commission anticipates the framework developed in this proceeding will interact with current and future proceedings that affect DER policies and sourcing.

⁴ R.14-10-003, p. 10.

⁵ PD, p. 10.

SCE recommends that the PD be modified to require a workshop process that enables stakeholders to develop a “roadmap” that identifies important interdependencies between the IDSR OIR and other proceedings, including the timing of when various issues will be resolved. For example, the recent Proposed Decision in Phase 2 of the Energy Efficiency (EE) OIR⁶ anticipates the next IOU EE funding applications may be filed by September 1, 2016.⁷ The roadmap is needed to identify whether any aspects of the IDSR framework must be resolved before those applications are filed or how outcomes of the IDSR framework will inform future EE funding requests. Thus, the purpose of the roadmap is to specify how the Commission expects the IDSR OIR to inform, or be informed by, proceedings that will result in the sourcing of DERs or have impacts on DER sourcing policy, such as the next EE and demand response (DR) funding applications. The development of the roadmap should be the first task in the IDSR OIR because the roadmap will provide direction and coordination for this and other proceedings. Devoting time in the IDSR OIR to the development of the roadmap will allow the DRP OIR to progress further and, importantly, better inform the development of the IDSR framework following the completion of the roadmap.

SCE has reviewed the scope of several related proceedings and developed the table below to identify these proceedings and issues currently in scope that may influence the development of the IDSR framework or be influenced by the IDSR framework. This table can serve as a starting point for a roadmap to be developed by stakeholders at the workshops recommended by SCE. Other proceedings and activities need to be reflected in the roadmap, including Energy Storage, Renewables Portfolio Standard, Long-Term Procurement Plan, General Rate Cases, California Independent System Operation (CAISO) transmission planning processes, and others. In addition, the roadmap will need to incorporate the timing for when issues are expected to be resolved in each proceeding.

⁶ R.13-11-005.

⁷ R.13-11-005, Proposed Decision Re Energy Efficiency Goals for 2016 and Beyond and Energy Efficiency Rolling Portfolio Mechanics, issued August 18, 2015, p. 52.

Proceeding	Issues That Will Influence IDSR	Issues Influenced by IDSR
DRP OIR	<ul style="list-style-type: none"> • Locational net benefits methodology and process • DER procurement policy and mechanisms 	<ul style="list-style-type: none"> • DER sourcing policy
EE OIR – Phase 3	<ul style="list-style-type: none"> • Revisions to Cost-effectiveness • To-Code Program Consideration • Review of Marketing, Education, and Outreach (ME&O) • Revisions to Evaluation, Measurement, and Verification (EM&V) • System-wide potential and goals 	<ul style="list-style-type: none"> • Increased targeting of EE programs
Next EE Funding Application	<ul style="list-style-type: none"> • To be determined 	<ul style="list-style-type: none"> • Requirements from the IDSR framework that necessitate significant changes to EE programs should be implemented through a future funding application
DR OIR	<ul style="list-style-type: none"> • Revisions to Cost-effectiveness • Revisions to EM&V • Development of new DR sourcing mechanisms 	<ul style="list-style-type: none"> • Increased targeting of DR programs • Increased use of DR programs and resources for distribution needs vs. system/CAISO needs • Potential needs for location-based DR incentives • Potential need for DR resources that are available outside of RA eligibility hours
Next DR Funding Application	<ul style="list-style-type: none"> • To be determined 	<ul style="list-style-type: none"> • Requirements from the IDSR framework may necessitate significant changes to DR programs through a future funding application
Long-Term Procurement Plan OIR	<ul style="list-style-type: none"> • System and local need determinations • Procurement authority for system and local needs 	<ul style="list-style-type: none"> • DER sourcing policy
Resource Adequacy (RA) OIR	<ul style="list-style-type: none"> • Revisions of RA counting and eligibility rules (capacity value) 	<ul style="list-style-type: none"> • To be determined

2. The Scope of the IDSR OIR is Redundant with Phase 2b of the DRP OIR

The PD describes the connection between this proceeding and the DRP OIR. If adopted, the PD will modify the scope of this proceeding to “determine how the distributed energy resources needed will be sourced, once the required characteristics and values of these resources have been determined in R.14-08-013.”⁸ It appears this proceeding will focus on developing a framework to be used by the investor-owned utilities (IOUs) to obtain DERs to fulfill needs identified in the DRPs. However, the Final Guidance provided for the IOUs’ DRPs stated the DRP proceeding would include a Phase 2b that would “entail stakeholder-driven development of DER procurement policy and mechanisms for the IOUs.”⁹ Because the objectives of these two proceedings sound duplicative, the PD should be modified to explain how the IDSR OIR will align with Phase 2b of the DRP OIR. SCE recommends DER procurement policy and mechanisms be addressed in the DRP OIR and the IDSR OIR focus on the roadmap proposed by SCE. SCE has no specific redline edits to the PD for this recommendation because it would fundamentally change the PD.

3. Valuation Should be Addressed in the DRP OIR

The PD is inconsistent on whether “valuation” will be addressed in the IDSR OIR or the DRP OIR. Some parts of the PD indicate the DRP OIR will address the issue.¹⁰ In other instances, the PD identifies the IDSR OIR as the proceeding to determine DER values.¹¹ SCE

⁸ PD, p. 11.

⁹ See R.14-08-013, Assigned Commissioner’s Ruling on Guidance for Public Utilities Code Section 769 – Distribution Resource Planning, February 6, 2015, Attachment (Guidance for Section 769 – Distribution Resource Planning), p. 12.

¹⁰ See, e.g., PD at p. 3 (“The scope of this proceeding will make a determination on how best to source the distributed energy resources needed by the utilities based on the determinations made in R.14-08-013, i.e., value of distributed energy resources”); p. 10 (“Hence, R.14-10-003 can and should create the framework to determine how the resources, which are needed to fill the required characteristics and values developed in R.14-08-013, could be sourced.”); & OP 1 at p. 25.

¹¹ See, e.g., PD at p. 22 (“The remainder of Phase I of this proceeding will support the development of an end-to-end framework for integrating demand-side resources, including relevant valuation methodologies and sourcing mechanisms”) & OP 7 at p. 26.

recommends that issues related to optimal location benefit analysis (and locational net benefits methodology) are properly addressed in the DRP OIR, as this is the venue in which the Commission has already determined that the topic will be considered.¹² It is more efficient to keep the issue in the DRP OIR because the record developed in that proceeding will play a significant role in the Commission's resolution of the issue. The IDSR OIR PD should be clarified to consistently state that the DRP OIR will address valuation.

B. The PD Should Identify the Components of the IDSR Regulatory Framework

Ordering Paragraph (OP) 4 of the PD states the goal of the IDSR OIR is to “develop and adopt a regulatory framework that is based on the impact and interaction of distributed energy and demand-side resources on an individual customer’s energy usage as well as the system as a whole and...enables customers to effectively and efficiently [choose] from an array of demand-side and distributed energy resources.”¹³ The PD is limited in discussing the content and characteristics of the regulatory framework to be developed in Phase 1. The PD specifies that the framework will consider various sourcing options and cost-effectiveness. However, it is unclear which, if any, of the other issues identified in the original OIR will be included in the framework.¹⁴ SCE understands that additional workshops will be held to determine the details of the framework, but recommends the PD be modified to identify the elements that will be part of the IDSR framework to enable effective planning for workshops. In addition to cost-effectiveness and sourcing strategies, SCE recommends the following elements be included in the IDSR framework:

¹² See R.14-08-013, Assigned Commissioner’s Ruling on Guidance for Public Utilities Code Section 769 – Distribution Resource Planning, February 6, 2015, Attachment (Guidance for Section 769 – Distribution Resource Planning), pp. 3-4.

¹³ PD, OP 4 at p. 26.

¹⁴ On pp. 10-11 of R.14-10-003, the Commission listed several potential demand-side issues to be addressed with the new framework, such as: goals and potential; funding levels and sources; marketing, education, and outreach (ME&O); long-term planning assumptions; and evaluation, measurement, and verification (EM&V).

- *Goals and Potential* – the framework should align and harmonize any DER procurement targets / needs from the DRP / IDSR process with the Commission-established goals for individual DER types (e.g., EE, demand response, energy storage *etc.*).
- *Funding sources* – the framework should identify the source of funding for IDSR and the alignment among IDSR funding, DRP funding, and funding for existing DER programs.
- *ME&O* – the framework should identify any new ME&O requirements and identify whether and how IDSR will leverage existing ME&O efforts for DER programs.
- *EM&V* – the framework should identify any EM&V requirements for IDSR and determine whether and how these requirements align with existing EM&V requirements for DERs

SCE also recommends that the IDSR framework consider the different approaches to DER sourcing that currently exist, such as the tariffs, programs, and solicitations used for EE and demand response, and seek to harmonize those with any new sourcing options in the framework.

C. The PD’s Use of the Term “Demand-Side Resources” is Inconsistent with the Proposed Scope for the Proceeding

The PD states it will “expand demand-side resources to include distributed energy resources, including resources on the system side of the customer’s meter, anywhere within the Commission’s jurisdictional (low-voltage and sub-transmission) distribution system.”¹⁵ If the Commission adopts a new scope to include resources on both the customer-side and utility-side of the meter, SCE urges the Commission not to expand the definition of “demand-side resources” but instead replace it with the term “distributed energy resources.” Using the term “integration of demand-side resources” to refer to integrating a set of resources that can include

¹⁵ PD, p. 17.

resources *not* on the customer, or demand, side of the meter will cause confusion and create inconsistencies with other Commission proceedings. If the Commission adopts the proposed scope, the PD should be modified to use the term “distributed energy resources” (DERs) throughout as that term is consistent with the terminology used in the goal established in OP 5 of the PD.¹⁶ In the event the proposed scope is adopted and this OIR provides a framework of sourcing mechanisms for DERs, the Commission should modify the PD to affirm that the objective of this proceeding is the integration of DERs (IDER). The Commission should also change the name of the proceeding to reflect the change in scope. For clarity in using these terms, SCE offers the following modification to the definition for integrating distributed energy resources:

A regulatory framework, developed by the Commission, to enable utility customers to effectively and efficiently choose from an array of demand-side resources, and for the utility to effectively select from all distributed energy resources, taking into consideration the impact and interaction of resources on the system as a whole as well as on an individual customer’s energy usage.

Should it be necessary to distinguish between the two types of DERs, the term DSR should be used specifically for those resources on the customer side (behind the meter) and the term “supply-side resource” (SSR) should be used specifically for those resources on the utility side (in front of the meter). The broader term DER should be used when referring to both DSRs and SSRs.

D. Tariffs Prominent in Active Proceedings Before the Commission Should Be Implemented in Those Proceedings

The PD states the IDSR OIR should “determine how to implement the tariffs” proposed in the DRP.¹⁷ SCE recommends that the PD be modified to state that if the DRP requires

¹⁶ PD, OP 5 at p. 26: the goal is: “To deploy **distributed energy resources** that provide optimal customer and system benefits, while enabling California to reach its climate planning objectives” (emphasis added).

¹⁷ PD, Conclusion of Law (COL) 3 at p. 25.

modifications to any tariffs being prominently discussed in active proceedings, modifications to those tariffs should occur in those proceedings. For example, if the DRP or IDSR OIR determines that modifications are needed to SCE's Rule 21 tariff, SCE recommends those modifications be considered and implemented in the Rule 21 OIR (R.11-09-011). Deferring to a proceeding in which a tariff is already being discussed can avoid duplication of effort, prevent potentially conflicting Commission guidance, and enable stakeholders with an interest in a particular tariff to understand all potential changes. To the extent tariff modifications or new tariff needs are identified, the IDSR roadmap proposed by SCE should identify the appropriate proceeding for each tariff implementation.

E. The Commission Should Issue a New Scoping Memo

The PD states "A ruling setting forth the schedule will be issued shortly after the issuance of this decision."¹⁸ Because the scope has changed significantly since the last Ruling and Scoping Memo, which was issued on January 5, 2015, SCE recommends that the PD be modified to indicate that a ruling and Scoping Memo setting forth the schedule as well as the modified scope will be issued following the issuance of a final decision on this matter. The ruling and Scoping Memo should be closely coordinated with the DRP Scoping Memo, expected later this year.

III.
CONCLUSION

SCE appreciates the opportunity to provide these comments on the PD and urges the Commission to adopt SCE's proposed modifications described in these comments and in Appendix A.

¹⁸ PD, p. 22.

Respectfully submitted,

JANET C. COMBS
R. OLIVIA SAMAD

/s/ R. Olivia Samad

By: R. Olivia Samad

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-3477
Facsimile: (626) 302-7740
E-mail: Olivia.Samad@sce.com

DATE: September 2, 2015

Appendix A

**SCE’S PROPOSED MODIFICATION TO COMMISSIONER FLORIO’S PROPOSED
DECISION ADOPTING AN EXPANDED SCOPE, A DEFINITION, AND A GOAL FOR
THE INTEGRATION OF DEMAND SIDE RESOURCES**

Proposed text deletions are in strikethrough (~~abcd~~)

Proposed text additions are underlined (abcd)

Reference	Proposed Modifications
PD Text	
p. 2	A regulatory framework <u>developed by the Commission</u> that enables to enable <u>utility</u> customers to effectively and efficiently choose from an array of demand-side <u>resources</u> , and <u>for the utility to effectively select from all</u> distributed energy resources, <u>taking into consideration</u> . The framework is based on the impact and interaction of such resources on the system as a whole, as well as on <u>an individual</u> customer’s energy usage.
p. 3	This proceeding remains open to support the development of an end-to-end framework for integrating demand-side resources, including relevant valuation methodologies <u>goals; funding sources; marketing, education, and outreach (ME&O); evaluation, measurement, and verification (EM&V); and</u> sourcing mechanisms.
p. 11	Additionally, this proceeding should determine how to implement the tariffs, contracts and other mechanisms proposed in R.14-08-013 <u>to the extent they are not already being addressed or implemented in other proceedings.</u>
p. 14	A regulatory framework developed by the Commission to enable utility customers to effectively and efficiently choose from an array of demand-side <u>resources</u> , and <u>for the utility to effectively select from all</u> distributed energy resources, taking into consideration the impact and interaction of such

Reference	Proposed Modifications
	resources on the system as a whole, as well as on the individual customer's energy usage.
pp. 16-17	Thus, we expand demand-side resources <u>this proceeding</u> to include distributed energy resources, including resources on the system side of the customer's meter, anywhere within the Commission's jurisdictional (low-voltage and sub-transmission) distribution system.
p. 17	A regulatory framework, developed by the Commission, to enable utility customers to most effectively and efficiently choose from an array of demand-side <u>resources</u> , and <u>for the utility to effectively select from all</u> distributed energy resources taking into consideration the impact and interaction of such resources on the system as a whole as well as on an individual customer's energy usage.
p. 22	The remainder of Phase I of this proceeding will support the development of an end-to-end framework for integrating demand-side resources, including relevant valuation methodologies and goals; funding sources; marketing, education, and outreach (ME&O); evaluation, measurement, and verification (EM&V); and sourcing mechanisms.
p. 22	We anticipate that the issues of localized incentives and cost-effectiveness valuation will occur first and simultaneously.
p. 22	A ruling <u>and Scoping Memo</u> setting forth the schedule <u>and modified scope</u> will be issued shortly after the issuance of this decision.
Findings of Fact (FOF)	

Reference	Proposed Modifications
FOF 16 (p. 24)	16. We should expand demand-side resources <u>this proceeding</u> to include distributed energy resources, including resources on the system side of the customer's meter, anywhere within the Commission's jurisdictional distribution system.
FOF 21 (p. 24)	21. Harmonization between system and customer benefits is required in the integration of demand-side <u>distributed energy</u> resources.
FOF 24 (New FOF)	24. It is not yet clear how Rulemaking 14-10-003 will align with other <u>proceedings addressing issues related to DSRs and DERs.</u>
Conclusions of Law (COL)	
COL 3 (p. 25)	3. This proceeding should determine how to implement the tariffs, contracts or other mechanisms proposed in Rulemaking 14-08-013 <u>to the extent they are not already being addressed or implemented in other proceedings.</u>
Ordering Paragraphs (OP)	
OP 2 (p. 26)	2. The scope of Rulemaking 14-10-003 is expanded to focus on the integration of demand-side <u>distributed energy</u> resources in a holistic way that includes not only what the utilities offer customers (integrated demand-side management) but also what customers offer the utility (integrated demand side <u>distributed energy</u> resources).
OP 3 (p. 26)	<p>3. The following definition of the integration of demand-side <u>distributed energy</u> resources is adopted:</p> <p style="padding-left: 40px;">A regulatory framework, developed by the Commission, to enable utility customers to effectively and efficiently choose from an array of demand-side <u>resources</u>, and <u>for the utility to effectively select from all</u> distributed energy resources taking into consideration the impact and</p>

Reference	Proposed Modifications
	interaction of resources on the system as a whole as well as on an individual customer's energy usage.
OP 5 (p. 26)	<p>5. The following goal for the integration of demand-side <u>distributed energy</u> resources is adopted:</p> <p>To deploy distributed energy resources that provide optimal customer and system benefits, while enabling California to reach its climate planning objectives.</p>
OP 7 (p. 26)	<p>7. Phase I of Rulemaking 14-10-003 remains open to develop the end-to-end framework for integrating demand-side <u>distributed energy</u> resources, including relevant valuation methodologies and goals; <u>funding sources; marketing, education, and outreach (ME&O); evaluation, measurement, and verification (EM&V);</u> and sourcing mechanisms.</p>
OP 8 (New OP)	<p>8. <u>The scope of Rulemaking 14-10-003 is expanded to include the development of a roadmap that identifies the interdependencies between Rulemaking 14-10-003 and other proceedings addressing DSR and DER issues, including Rulemaking 14-08-013. The roadmap shall include the timing of when issues will be resolved.</u></p>